

AO 91 (Rev. 11/11) Criminal Complaint

FELONY

United States Courts Southern

UNITED STATES DISTRICT COURT

District of Texas

FILED

for the

December 23, 2022

Southern District of Texas

Nathan Ochsner, Clerk of Court

United States of America

v.

Jorge Enrique CHACON

Case No.

1:22-MJ-1167

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/22/2022 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 841(a)(1)
 21 USC 846

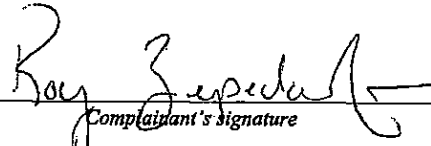
Possession with Intent to Distribute a Controlled Substance
 Conspiracy to Distribute a Controlled Substance

This criminal complaint is based on these facts:

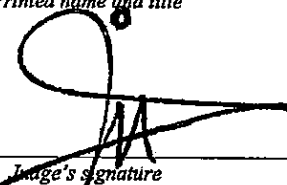
See attached affidavit

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to,
 signature attested telephonically per Fed. R.
 Crim.P.4.1, on

Date: 12/23/2022City and state: Brownsville, Texas

Complainant's signature

Roy Zepeda, FBI Task Force Officer

Printed name and title

Judge's signature

Ignacio Torteya III, US Magistrate Judge

Printed name and title

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ATTACHMENT A

Nathan Ochsner, Clerk of Court

AFFIDAVIT OF FBI TASK FORCE OFFICER ROY ZEPEDA

1. In December of 2022, FBI agents initiated an investigation into the drug trafficking activities of a subject later identified as Jorge Chacon. Chacon was living in Brownsville, Texas where he was selling cocaine on behalf of the Gulf Cartel.

2. On December 22, 2022, Chacon spoke with an FBI confidential human source (CHS) and said he was willing to sell kilos of cocaine for \$13,000 each. Chacon offered to show the CHS the drugs and met the CHS at Lowes near Ruben M. Torres in Brownsville. FBI agents activated a recording device and gave it to the CHS. Once the CHS arrived at the Lowes, Chacon arrived in a Black Ford F150 four door pickup truck accompanied by another unidentified male subject. The unidentified driver and Chacon pulled right next to the CHS and showed him the bundles of narcotics. The CHS told Chacon to follow him.

3. The CHS told Chacon there was another subject who had the money. The driver and Chacon followed CHS to a Stripes convenient store located at the corner of McAllen Rd and Morrison Rd in Brownsville, Texas. The unidentified male driver and Chacon parked at a gas pump next to CHS's vehicle. The unidentified male driver went into the store. FBI agents then approached vehicle and arrested Chacon. Agents found a backpack in the backseat containing five wrapped bundles of what appeared to be cocaine.

6. Agents transported Chacon, and the suspected drugs to the Brownsville FBI office. Agents conducted a presumptive field test of the substance in one of the bundles, which tested positive for the characteristics of cocaine. Agents sealed the bundle they tested, and then weighed all five bundles together, which totaled approximately 5943 grams.

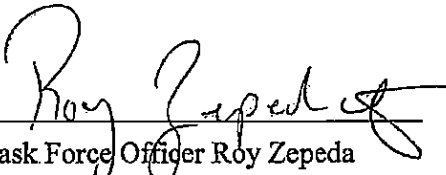
7. Chacon was read his notice of rights; Chacon did want not to speak with agents without a lawyer present.

Submitted by reliable electronic means, sworn to, signature attested

telephonically per Fed. R. Crim.P. 4.1., on

December 23, 2022

Date



Task Force Officer Roy Zepeda
Federal Bureau of Investigation



Ignacio Torteya III
UNITED STATES MAGISTRATE JUDGE